

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS**

DENNIS GROMOV, individually and on)	
behalf of all other similarly situated,)	
)	
Plaintiff,)	Case No. 1:22-cv-06918
)	
v.)	Hon. Franklin U. Valderrama
)	
BELKIN INTERNATIONAL, INC.,)	Magistrate Judge Gabriel A. Fuentes
)	
Defendant.)	

JOINT MOTION TO AMEND DISCOVERY SCHEDULE

Plaintiff Dennis Gromov (“Plaintiff”) and Defendant Belkin International, Inc. (“Belkin”), by and through their undersigned counsel, hereby jointly move the Court to amend the discovery schedule with respect to discovery dates based on the Court’s February 28, 2024 Order and the parties’ discussion with the Court at the March 22, 2024 status conference (*See* Dkt. Nos. 85, 95). Based on those proceedings and the parties’ further discussions, the parties jointly request that the discovery schedule be amended as follows:

1. **May 14, 2024:** Belkin to complete its rolling production of documents and serve supplemental responses, as appropriate, to written discovery requests covered by the Court’s February 28, 2024 Order.
2. **May 24, 2024:** Consistent with the Court’s March 22 minute order, Belkin to provide by this date at least two alternative dates for the depositions of Norbert Von Boode, Melody Tecson, and Belkin’s 30(b)(6) designees..
3. **July 18, 2024:** Fact discovery to close.
4. **August 15, 2024:** Opening expert disclosures pursuant to Federal Rule of Civil Procedure 26(a)(2) to be served.

5. **September 12, 2024:** Rebuttal expert reports, if any, to be served.
6. **October 10, 2024:** Expert discovery to be completed.

Dated: March 29, 2024

Respectfully submitted,

/s/ Laura A. Kelly

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